

MARTIN B. KATZ, ESQ.  
107 D E. Glenside Avenue  
Glenside, PA 19038  
PA ID # 58614  
(215) 439-8150

ATTORNEY FOR PLAINTIFF

---

Manuel Mota  
6033 Shisler Street  
Phila., PA 19149

Plaintiff

v.  
Aaron's Sales and Lease Ownership  
3451 Aramingo Ave  
Phila., PA 19134

Defendant

: United States

: District Court

: for the Eastern District

: of Pennsylvania

---

## COMPLAINT

Plaintiff, for his Complaint against Defendant, states and alleges as follows:

### I. JURISDICTION AND PARTIES

(1) This suit is brought and jurisdiction lies pursuant to Section 107(a) of the Americans with Disabilities Act (hereinafter "ADA"), 42 U.S.C., 12117, which incorporates by reference 706 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e-5.

(2) All conditions precedent to jurisdiction under 706 of title VII, 42 U.S.C. 2000e-5(f)(3), have occurred or been complied with.

(a) A charge of employment discrimination on the basis of disability was filed with the Pa. Human Relations Commission (PAHRC) and the Equal Employment Opportunity Commission (EEOC) within 180 days of the commission of the unlawful employment practice alleged herein.

(b) A Notification of right to Sue was received from the PAHRC/EEOC on May 17, 2011.

(c) This complaint has been filed within 90 days of receipt of the PAHRC/EEOC's Notification of Right to Sue.

(3) Plaintiff Manuel Mota, is a resident of the state of Pennsylvania who resides at 6033 Shisler St., Phila, PA 19149.

(4) All the discriminatory employment practices alleged herein were committed within the state of Pennsylvania.

(5) At all times relevant, Plaintiff is an individual with a "disability" as that term is defined in Section 3 (2) of the ADA, 42 USC 12102(2).

(6) Defendant Aaron's Sales and Lease Ownership (hereinafter "Aaron's") is a PA corporation, with its office and principal place of business in Philadelphia.